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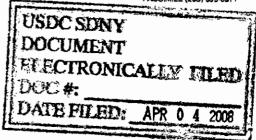
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Our Ref: 584-07/PJG

## <u>Via Fax - 212 805-0426</u>

Honorable Laura T. Swain United States District Judge Daniel Patrick Moynihan United States Courthouse 500 Pearl Street, Room 755 New York, New York 10007

## MEMO ENDORSED

Re: Double Happiness Shipping Company Limited v. Cosmotrade Exports S.A.

07 CV 4615 (LTS)

Dear Judge Swain:

We represent the Defendant in the captioned action and write, further to our letter earlier this week, to provide the Court with the following motion schedule for the completion of our client's application for countersecurity:

Plaintiff's opposition papers due April 17, 2008.

Defendant's reply papers due April 25, 2008

For Your Honor's guidance, the parties will continue to try to resolve the matter on an amicable basis in the interim, but to the extent that does not occur, and provided the Court has no objection, we will proceed to finalize the motion on the above schedule.

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We are grateful to Your Honor for your attention to the foregoing and hope this meets with your approval.

Respectfully submitted,

FREEHNLL HOGAN & MAHAR LLP

Peter J. Gutowski

PJG:mjg

cc: Via Email - tbelknap@BlankRome.com

Blank Rome LLP

Attn: Thomas H. Belknap, Jr., Esq.

The matter is restored to the active docker and the proposed briefing schedule is approved.

SO ORDERED.

LAURA TAYLOR SWAIN

UNITED STATES DISTRICT JUDGE